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PROPOSED PHASE III REMOVAL ACTIONS

01/14/92

**DOE-667-92
DOE-FO/EPA
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LETTER**



Department of Energy
Fernald Environmental Management Project
P.O. Box 398705
Cincinnati, Ohio 45239-8705
(513) 738-6357

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DOE-667-92

Mr. James A. Saric, Remedial Project Director
U. S. Environmental Protection Agency
Region V - 5HR-12
230 South Dearborn Street
Chicago, Illinois 60604

Mr. Graham E. Mitchell, DOE Coordinator
Ohio Environmental Protection Agency
40 South Main Street
Dayton, Ohio 45402-2086

Dear Mr. Saric and Mr. Mitchell:

PROPOSED PHASE III REMOVAL ACTIONS

As required by the 1991 Amended Consent Agreement, Section IX.F.2, below are schedules for the submission of work plans or other appropriate documentation for Phase III removal actions, including low-level waste/thorium management, safe shutdown activities, and Plant 7 decontamination and dismantling activities.

DOE shall compile revisions on an annual basis to the Low-Level Waste/Thorium Management and Safe Shutdown Programs' original submittals of work procedures which were previously provided to the EPA. Specifically, submittals shall be made by June 30, 1992, and each year thereafter until program completion. In addition, interim submittals of major new documents or major revisions to existing procedures for these programs shall be made, individually, as necessary. Additionally, DOE shall submit a Removal Action Work Plan for the decontamination and dismantling of Plant 7 (Removal Action Number 19) to the U.S. EPA and Ohio EPA by April 20, 1993.

The outline below is a list of proposed additional removal actions and a schedule for submitting works, or other appropriate documentation for each action:

1. Waste Pit Area Containment Improvement (Operable Unit 1)

Submit Work Plan to U.S. EPA

August 31, 1992

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Includes: containment of specified contaminated soil areas; correction of Pit 4 south berm erosion, protection from Burn Pit wind erosion, and improvements to vegetation cover on pits.

2. Inactive Fly Ash Pile (Operable Unit 2)

Submit results of evaluation to address contaminated soils and a schedule for submittal of a work plan (if required)

June 30, 1992

Referring to U.S. EPA's comments on the current removal action, the U.S. Department of Energy (DOE) will complete an evaluation to address the contaminated soils from this area given the apparent degree of soil contamination exhibited at select locations. Based on this evaluation, a determination may be made as to initiating soil "hot spots" excavation, if required, and a schedule will be provided for submittal of a work plan to the U.S. EPA.

3. Pilot Plant Sump (Operable Unit 3)

Submit Work Plan to U.S. EPA

July 31, 1992

This sump is located on the southwest side of the Pilot Plant. The sump consists of a stainless steel cylinder approximately two feet in diameter and ten feet deep.

This sump was built to remove liquids from the floor drains of the Pilot Plant and was actively used only during the renovation of the Pilot Plant in 1969. The sump is filled with a thick liquid and sludge. Analytical results of the sump contents show high concentrations of metals: lead, copper, chromium, nickel, as well as thorium and volatile organic compounds.

Includes: removal of the liquid and sludge from the sump and removal of the tank to mitigate the potential for a release to the environment.

4. Nitric Acid Tank Car and Area (Operable Unit 3)

Submit Work Plan to U.S. EPA

October 30, 1992

The Nitric Acid Rail Car is located on the northern perimeter of the production area and east of Building 63. The Fernald Environmental Management Project (FEMP) RCRA Part A and Part B identify this tank car and area surrounding it as a Hazardous Waste Management Unit.

This high-grade, stainless steel tank car has a capacity of approximately 100,000 pounds and measures approximately 10 feet wide x 40 feet long x 15 feet high. This unit operated from 1952 until about 1989. This tank car stored nitric acid used at the FEMP. Based on recent analysis, the tank car now contains 50-100 gallons of nitric acid.

Includes: removal of residue contents of the tank car followed by decontamination and dispositioning of the tank car; as well as characterizing and subsequent excavation and disposition of the nearby soils for contaminants related to the tank car.

5. Asbestos Removals (Asbestos Program - Operable Unit 3)

Submit Work Procedures

May 19, 1992

This removal action documents ongoing asbestos abatement activity at the FEMP, to mitigate the potential for contaminant release and migration. Abatement within the Asbestos Program include in-situ repairs, encasement, and encapsulation, as well as removals.

6. Management of Contaminated Structures at the FEMP

Submit Engineering Evaluation/Cost Analysis (EE/CA) to the U.S. EPA to support Proposed Removal Actions for Managing Contaminated Structures or Facilities.

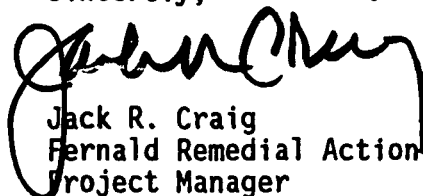
December 16, 1992

The EE/CA shall document the selection of a response(s) that will mitigate the potential threat to workers, the general public, and the environment associated with these structures or facilities, and address health and environmental impacts associated with the proposed action. The EE/CA shall be completed in a manner consistent with the technical approach contained within the Operable Unit (OU 3) RI/FS Work Plan addendum. The EE/CA shall consider interim disposition issues addressed in the OU 3 Work Plan, as well as issues related to ongoing site activities, and integration with other operable units.

The intent is to establish a broad-based removal action to support the implementation of cleanup actions at FEMP contaminated facilities. On the basis of the annual facility utilization study (Section IX.E.4 of the Amended Consent Agreement) and an assessment of available funding, the DOE would propose, within the annual removal action review, dates for submitting work plans describing discrete actions to be taken within the envelope of the removal action. The work plans would be submitted to U.S. EPA for approval consistent with Section IX.C.

If you or your staff have any questions, please contact me at FTS 774-6159 or (513) 738-6159.

Sincerely,


Jack R. Craig
Fernald Remedial Action
Project Manager

FO:Craig

cc:

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